

International Union of Operating Engineers



Business Manager & President
Mark N. Kirsch

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March 7, 2006

Ms. Jodi Winship
Campaign Finance Analyst
Report Analysis Division
Federal Election Commission
Washington DC 20463

Dear Ms. Winship:

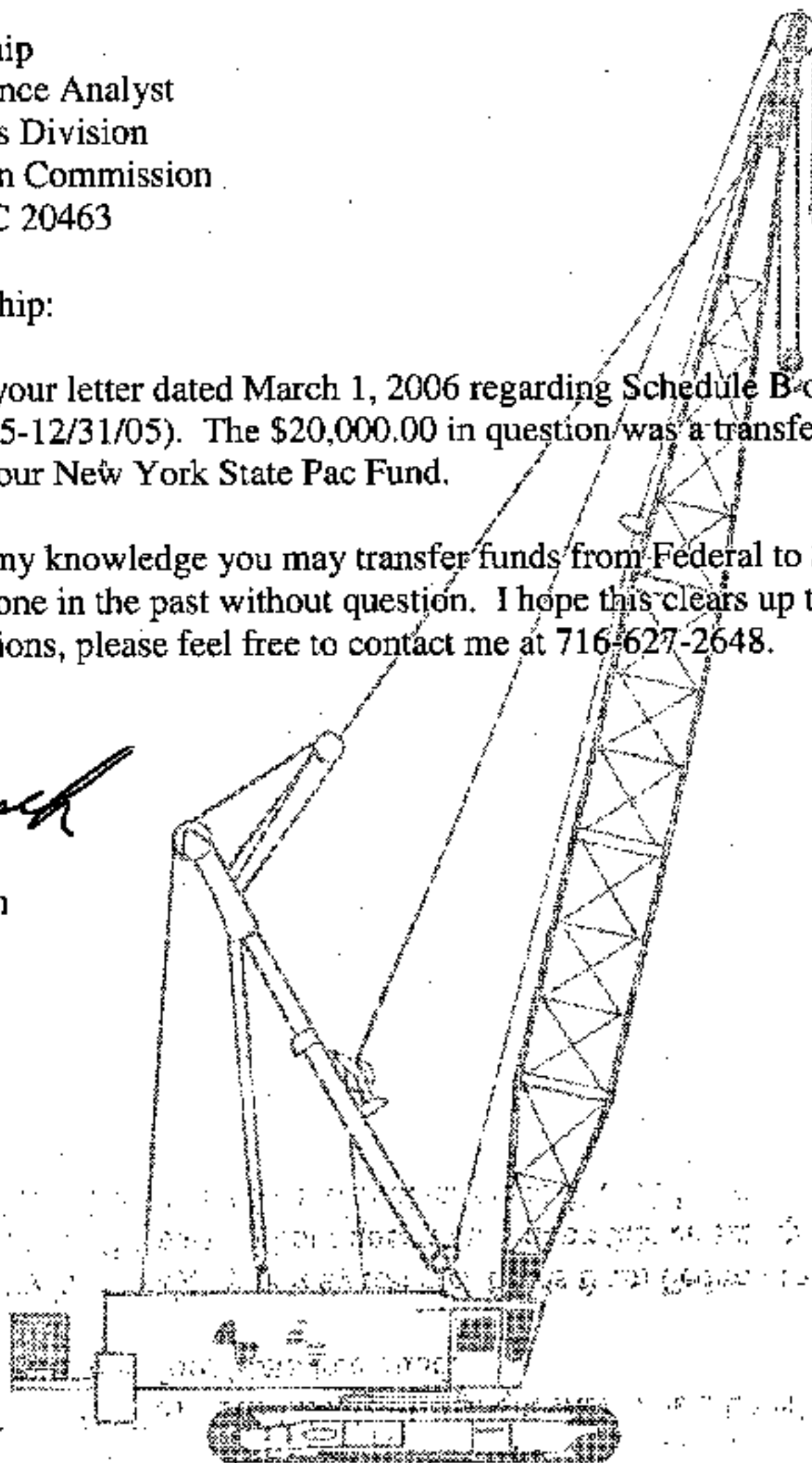
In response to your letter dated March 1, 2006 regarding Schedule B of my year end report of (7/1/05-12/31/05). The \$20,000.00 in question was a transfer of funds from our Federal Pac to our New York State Pac Fund.

To the best of my knowledge you may transfer funds from Federal to State PAC only, which I have done in the past without question. I hope this clears up the matter. If you have any questions, please feel free to contact me at 716-627-2648.


Sincerely,

Mark N. Kirsch
Treasurer

MNK:dk



Federal Election Commission
ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS
The FEC added this page to the end of this filing to indicate how it was received.

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